

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SKYHOOK WIRELESS, INC.,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 1:10-cv-11571-RWZ

Civil Action No. 1:13-cv-10153-RWZ

JOINT MOTION TO CORRECT CERTAIN EXHIBITS

Skyhook Wireless, Inc. (“Skyhook”) and Google Inc. (“Google”) respectfully, jointly request that the Court allow corrected versions of three exhibits to be filed in place of exhibits that were filed by Skyhook last week. Each of these three exhibits contains information that was produced subject to the Amended Protective Order in this case and as to which the Court previously granted Motions to Seal. *See* Dkt. Nos. 165-1, 570, 610, 611. Thus, to fully implement the Court’s previously granted Motions to Seal and to comply with the prior agreements of the parties, Skyhook and Google make this joint request that these three corrected exhibits be allowed.

Under the Court’s February 20, 2015 order regarding the procedures for filing certain materials under seal, the parties must meet and confer before motions are filed in order to determine if protected information contained in such motions can be removed, excerpted or redacted. *See* Dkt. No. 570; *see also* Dkt. No. 562. In light of this order, Skyhook and Google met and conferred and determined that certain information could be removed, excerpted or redacted from their previously filed Motions *in Limine*. These revised Motions *in Limine* were then filed on February 23, 2015, including with irrelevant information excerpted and limited other, protected information redacted. On February 25, 2015, the Court granted Skyhook’s and Google’s motions to seal certain information contained in these filings. *See* Dkt. No. 610 at 1. The parties subsequently discovered, however, that three of the exhibits filed by Skyhook needed to be corrected in order to reflect the parties’ meet and confer agreements and fully implement the Court’s orders. Skyhook and Google contacted the Court on February 27, 2015 to discuss this problem, and the Court temporarily removed the three exhibits from the docket.

Thus, to provide corrected, compliant copies of these three exhibits to the Court, the parties respectfully request that the three previously-submitted, erroneous exhibits be

permanently removed from the docket and replaced with corrected versions of these exhibits.

Google will lodge the corrected versions of these three exhibits with the Court, concurrently with this Motion.

Respectfully submitted:

/s/ Azra M. Hadzimehmedovic

Matthew D. Powers (*pro hac vice*)
Steven S. Cherensky (*pro hac vice*)
Paul T. Ehrlich (*pro hac vice*)
William P. Nelson (*pro hac vice*)
Azra M. Hadzimehmedovic (*pro hac vice*)
Aaron M. Nathan (*pro hac vice*)
TENSEGRITY LAW GROUP LLP
555 Twin Dolphin Drive, Suite 360
Redwood Shores, CA 94065
Phone: (650) 802-6000
matthew.powers@tensegritylawgroup.com
steven.cherensky@tensegritylawgroup.com
paul.ehrlich@tensegritylawgroup.com
william.nelson@tensegritylawgroup.com
azra@tensegritylawgroup.com
aaron.nathan@tensegritylawgroup.com

Thomas F. Maffei (BBO 313220)
Douglas R. Tillberg (BBO 661573)
SHERIN AND LODGEN LLP
101 Federal Street
Boston, MA 02110
(617) 646-2000
tfmaffei@sherin.com
smcconchie@sherin.com

Attorneys for
SKYHOOK WIRELESS, INC.

/s/ Asim M. Bhansali

Robert Van Nest (*pro hac vice*)
Asim M. Bhansali (*pro hac vice*)
Rachael E. Meny (*pro hac vice*)
Matthias A. Kamber (*pro hac vice*)
KEKER & VAN NEST LLP
633 Battery Street
San Francisco, CA 94111-1809
Tel: 415 391 5400
Fax: 415 397 7188
Email: rvannest@kvn.com
abhansali@kvn.com
rmeny@kvn.com
mkamber@kvn.com

William F. Abrams (*pro hac vice*)
Sanjeet Dutta (*pro hac vice*)
STEPTOE & JOHNSON, LLP
1001 Page Mill Road
Building 4, Suite 150
Palo Alto, CA 94304-1036
Tel: (650) 687-9500
Fax: (650) 687-9499
Email: wabrams@steptoe.com
sdutta@steptoe.com

Boyd Cloern (*pro hac vice*)
STEPTOE & JOHNSON, LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
Tel: (202) 429-6230
Fax: (202) 429-3902
Email: bcloern@steptoe.com

James D. Smeallie
Benjamin M. Stern
HOLLAND & KNIGHT
10 St. James Avenue, 11th Floor
Boston, MA 02116
Tel: (617) 523-2700
Fax: (617) 523-6850
Email: *jd.smeallie@hklaw.com*
benjamin.stern@hklaw.com

Attorneys for
GOOGLE INC.

Dated: March 2, 2015

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper copies will be sent to those indicated as non-registered participants on March 2, 2015.

s/ Asim M. Bhansali
Asim M. Bhansali